
EXHIBIT A

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DATE FILED: 9/16/2015

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK-----X
UNITED STATES OF AMERICA**STIPULATED
PROTECTIVE ORDER**

- v. -

15 Cr. 588 (ER)

AHMED MOHAMMED EL GAMMAL,
a/k/a "Jammie Gammal,"Defendant.
-----X

EDGARDO RAMOS, District Judge:

WHEREAS, AHMED MOHAMMED EL GAMMAL, a/k/a "Jammie Gammal," the defendant, has sought from the Government access to certain materials that are discoverable pursuant to Rule 16 of the Federal Rules of Criminal Procedure ("Rule 16"), including certain materials that, if disseminated to third parties, could, among other things, implicate the safety of others and impede ongoing investigations (the "Protected Materials");

WHEREAS, the Government desires to protect the safety of others and ongoing investigations disclosed in the Protected Materials; and

WHEREAS, in the interest of expediting the discovery process, AHMED MOHAMMED EL GAMMAL, the defendant, by his attorney, Sabrina Shroff, Esq., consents to the entry of this Order;

NOW, THEREFORE, IT IS HEREBY ORDERED:

1. The Protected Materials shall be used by the defendant, his counsel, and his counsel's agents only for purposes of defending the charges, in connection with sentencing, and pursuing any appeals, in this criminal action. To the extent the Protected Materials are shown to additional persons consistent with the terms set forth below, those additional persons

may use the Protected Materials only in connection with this criminal action.

2. The Government will mark all items subject to this protective order in a manner indicating their protected status.

3. The Protected Materials and the information and identities contained or disclosed therein:

(a) Shall be used by the defendants or his counsel only for purposes of this action;

(b) Shall not be disclosed in any form by the defendant or his counsel except as set forth in paragraph 3(c) below;

(c) May be disclosed only by the defendant's counsel and only to the following persons (hereinafter "Designated Persons"):

(i) investigative, secretarial, clerical, paralegal and student personnel employed full-time or part-time by the defendant's attorneys;

(ii) independent expert witnesses, investigators or advisors retained by the defendant in connection with this action; and

(iii) such other persons as hereafter may be authorized by the Court upon such motion by the defendant; and

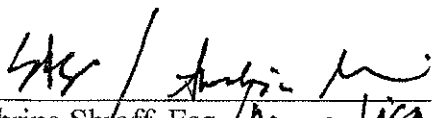
(d) Shall be returned to the Government following the conclusion of this case. *or destroyed*

4. The defendant and his counsel shall provide a copy of this Order to Designated Persons to whom the Protected Materials are disclosed pursuant to paragraph 3(c)(i),

(ii) and (iii). Designated Persons shall be subject to the terms of this Order.

5. The provisions of this Order shall not be construed as preventing the disclosure of any information in any motion, hearing, trial, or sentencing proceeding held in this action or to any judge or magistrate of this Court in connection with the above-captioned matter.


AGREED AND CONSENTED TO:



Sabrina Shroff, Esq. / Anna Lisa Miron
Attorney for AHMED MOHAMMED EL GAMMAL,
a/k/a "Jammie Gammal,"
9/16/15

Date

SO ORDERED:



HON. EDGARDO RAMOS
UNITED STATES DISTRICT JUDGE
9/16/15

Date